

July 13, 2001

Sent Via Electronic Mail

Mr. Oscar Hernandez
US EPA Headquarters
401 M Street, SW
East Tower, 104A
Washington, DC 20460

Re: High Production Volume (HPV) Chemical Challenge Program – Test Plan Submission for HPV registration number 1101064

Dear Mr. Hernandez:

The American Chemistry Council Olefins Panel¹ (Panel) submits for review and public comment its test plan, as well as related robust summaries, for the “Olefins” category of chemicals under the Environmental Protection Agency’s High Production Volume (HPV) Chemical Challenge Program. The Panel understands that there will be a 120-day review period for the test plan and that all comments generated by or provided to EPA will be forwarded to the Panel for consideration.

This test plan addresses streams that are products of the ethylene process and associated C4 processes and that contain predominantly isobutene, isobutylene, butane, 1-butene, and 2-butene. The plan addresses the category by evaluating some mixed C4 process streams and most of the major C4 components.

Briefly, the test plan for the olefins category includes the following test:

- A rat inhalation combined repeated dose/reproductive and developmental effects/neurotoxicity screen (OECD Guideline 422) on a high purity butene-1 stream. Butene-1 is sponsored through the ICCA HPV Program.

In the development of this test plan, the Panel considered carefully and tried to limit how many animals might be required for tests included in the proposed plan and conditions to which the animals might be exposed. As a result, the Panel believes that the concerns of some non-governmental

¹ The members of the Olefins Panel are BP Amoco Chemical Company, Chevron Phillips Chemical Company, CONDEA Vista Company, The Dow Chemical Company, E.I. du Pont de Nemours and Company, Eastman Chemical Company, Equistar Chemicals, LP, ExxonMobil Chemical Company, Fina Oil and Chemical Company, Formosa Plastics Corporation, U.S.A., The B.F. Goodrich Company, The Goodyear Tire & Rubber Company, Huntsman Corporation, Koch Industries, NOVA Chemicals Inc., Shell Chemical Company, Sunoco, Inc., Texas Petrochemicals Corporation, Westlake Chemical Corporation, and Williams Olefins, LLC,

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organizations about animal welfare have been fully considered and that use of animals in this proposed test plan has been minimized.

Thank you in advance for your attention to this matter. In contacting this Panel please address Patricia Messenger at (703) 534-3582 or Elizabeth Moran at (301) 924-2006.

Sincerely yours,

Courtney M. Price,
Vice President, CHEMSTAR

CC: C. Auer, EPA
Olefins Panel